

PROVENANCE™
Your path to health and well-being

October 29, 1999

Dr. Robert Moore
Office of Special Nutritionals (HFS-450)
Center for Food and Safety and Applied Nutrition
Food and Drug Administration
200 C Street SW
Washington, DC 20204



VIA U.S. POSTAL MAIL

RE: STATEMENTS OF NUTRITIONAL SUPPORT

Dear Dr. Moore:

Pursuant to Section 6 of the Dietary Supplement Health and Education Act of 1994, *Herbalogix, Inc. 987 North Enterprise Street, Orange, CA 92867*, wishes to notify the Food and Drug Administration that it has, within the past 30 days, commenced marketing a line of dietary supplements, which bears statements of nutritional support.

The following list notes the structure function claims for each dietary supplement product. These statements are accompanied by the required disclaimer that is prominently displayed in bold-faced type.

These statements of nutritional support are based on a large body of data, which, in our judgment renders these statements, truthful and non-misleading.

Sincerely,


Joel E. Rath
Managing Director

JR:ln

Enclosures

987 N. Enterprise Street
Orange California 92867-5472
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979-0162

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PROVENANCE™

CLAIM	Product Name
Gentle Cycle™ or Personal Matters™ Menopause Support™ for comfort during cyclic changes*	Objectives Personal Matters Gentle Cycle For Women™
Personal Matters Gentle Cycle™ Monthly support for the female cycle.*	Objectives Personal Matters Gentle Cycle For Women™
Personal Matters Gentle Cycle™ Provides support for a woman's monthly cycle*	Objectives Personal Matters Gentle Cycle For Women™
Personal Matters™ Gentle Cycle™ for comforting monthly support*	Objectives Personal Matters Gentle Cycle For Women™
Personal Matters Gentle Cycle™ blends classic herbs and science based nutrients to provide comforting monthly support for the feminine cycle.*	Objectives Personal Matters Gentle Cycle For Women™
Vitex and Black Cohosh extracts are known to help balance a woman's cycle and offer natural support for hormone levels.*	Objectives Personal Matters Gentle Cycle For Women™
Black Cohosh Root, Soy Isoflavones, Wild Yam, and Red Clover are rich phytoestrogen botanicals popular throughout the world for providing nourishment for the mid-life woman and have been traditionally used to support and balance hormones.*	Objectives Personal Matters Menopause Support™
Dong Quai, known as "female ginseng" has a balancing effect on the feminine hormonal system.*	Objectives Personal Matters Menopause Support™
Gentle Cycle™ or Personal Matters™ Menopause Support™ for comfort during cyclic changes*	Objectives Personal Matters Menopause Support™
Personal Matter Menopause Support™ *	Objectives Personal Matters Menopause Support™
Personal Matters Menopause Support™ Designed to support a woman's body during mid-life transitions*	Objectives Personal Matters Menopause Support™
Personal Matters Menopause Support™ Provides nutritional support during a woman's change of life.*	Objectives Personal Matters Menopause Support™
Personal Matters Menopause Support™ combines concentrated nutrients and herbs in an all natural formula to provide nutritional support during a woman's mid-life transitions.*	Objectives Personal Matters Menopause Support™
Enhances and supports energy levels and vitality, especially as one ages.*	Objectives Personal Matters Passion for Men™
Personal Matters Passion for Men™ Enhances energy levels and vitality*	Objectives Personal Matters Passion for Men™
Personal Matters Passion For Men™ combines concentrated nutrients and herbs in an advanced formula to enhance performance and restore vitality.*	Objectives Personal Matters Passion for Men™
Personal Matters Passion for Women™ An innovative formula designed to enhance vitality and a healthy personal life.*	Objectives Personal Matters Passion for Women™
Personal Matters Passion for Women™ Designed to enhance vitality and a healthy libido*	Objectives Personal Matters Passion for Women™
Beta Sitosterol and Soy Isoflavones supports healthy feminine hormone balance.*	Objectives Personal Matters Passion for Women™
Female vitality herbs Wild Oat, Siberian Ginseng, Gotu Kola, and Pueraria Root support the female reproductive system and have been traditionally used to enhance libido.*	Objectives Personal Matters Passion For Women™
Personal Matters Passion For Women™ is a specially crafted formula designed to support healthy libido in women.*	Objectives Personal Matters Passion For Women™
Provides nutritional support for women who may experience hormonal changes and fatigue.*	Objectives Personal Matters Passion For Women™
Personal Matters Prostate Maintenance™ A comprehensive formula that promotes urinary health in men and helps to maintain the prostate.*	Objectives Personal Matters Prostate Maintenance™
Personal Matters Prostate Maintenance™ Promotes urinary tract health*	Objectives Personal Matters Prostate Maintenance™
Personal Matters Prostate Maintenance™ To maintain healthy prostate.*	Objectives Personal Matters Prostate Maintenance™

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CLAIM	Product Name
Personal Matters Prostate Maintenance™ provides a superior phyto-nutrient formula to naturally support prostate function and health.*	Objectives Personal Matters Prostate Maintenance™
Saw Palmetto and Pygeum extracts support the lower male urinary tract and are the subject of scientific research for prostate health.*	Objectives Personal Matters Prostate Maintenance™
Personal Matters Urinary Tract Support™ A synergistic blend of herbs and nutrients designed to support urinary tract health.*	Objectives Personal Matters Urinary Tract Support™
Personal Matters Urinary Tract Support™ Designed to support urinary tract health*	Objectives Personal Matters Urinary Tract Support™
Personal Matters Urinary Tract Support™ Supports a healthy urinary tract.*	Objectives Personal Matters Urinary Tract Support™
Cranberry has been the focus of recent research suggesting that it promotes urinary tract health.*	Objectives Personal Matters Urinary Tract Support™
Juniper berry, Olive Leaf, and Red Raspberry are all well known for their beneficial effects on the kidney and bladder.*	Objectives Personal Matters Urinary Tract Support™
Personal Matters Urinary Tract Support™ is a strengthening and toning formula that naturally supports urinary tract health.*	Objectives Personal Matters Urinary Tract Support™
An ingredient in Green Tea, called polyphenols, is responsible for its activity as a potent antioxidant.*	Objectives Radical Antioxidants™
EDS® is a scientifically formulated proprietary blend of high potency plant enzymes that support assimilation and absorption.*	Objectives SuperImmune™
Standardized Echinacea purpurea, Echinacea augustifolia, and Astragalus root for immune system strengthening.*	Objectives SuperImmune™
Super Immune™ to boost immune support*	Objectives SuperImmune™
SuperImmune™ Boosts the body's defenses*	Objectives SuperImmune™
SuperImmune™ is specifically targeted to help strengthen your immune system.*	Objectives SuperImmune™
Vitamin C, citrus bioflavonoids, calcium and zinc to help build a healthy immune system.*	Objectives SuperImmune™
A balanced ratio of calcium and potassium to regulate water balance in the body.*	Objectives WaterLoss™
Contains Uva Ursi, Juniper Berry and Dandelion Leaf, tonic herbs for superior urinary tract health.*	Objectives WaterLoss™
Uva ursi, also known as mountain cranberry or bearberry, is a shrub that typically grows at higher elevations. As a nutritional supplement, the plant soothes and strengthens.*	Objectives WaterLoss™
Waterloss™ Maintains healthy water balance*	Objectives WaterLoss™
WaterLoss™ contains Uva Ursi, a plant renowned for its cleansing effect on the kidney and bladder, along with our exclusive blend of traditional herbs for strengthening and toning the kidneys and bladder.*	Objectives WaterLoss™
WaterLoss™ is a gentle blend of minerals, herbs, and other nutrients formulated to promote urinary health.*	Objectives WaterLoss™
Waterloss™ to maintain a healthy water balance.*	Objectives WaterLoss™
Contains Boswellia, an Ayurvedic herbal remedy, shown to have a beneficial effect on improved joint function.*	Objectives Well Connected™
Essential joint co-factors, Vitamin C, E, Quercetin, N-Acetyl Cysteine, Calcium, Zinc and Selenium, are nutrients involved in the maintenance of collagen and cartilage.*	Objectives Well Connected™
Glucosamine Sulfate is a dietary ingredient that nutritionally supports connective tissue and joint structure.*	Objectives Well Connected™
Shark Cartilage, has been extensively researched for its effects on promoting joint function.*	Objectives Well Connected™
SuperImmune™ for immune system support*	Objectives Well Connected™
Well Connected™ Flexibility and Joint Formula*	Objectives Well Connected™
Well Connected™ for joint support*	Objectives Well Connected™
Well Connected™ is an exclusive formulation of nutrients that have been shown to provide long term nutritional support for joint health and mobility.*	Objectives Well Connected™
Well Connected™ Supports joint health*	Objectives Well Connected™